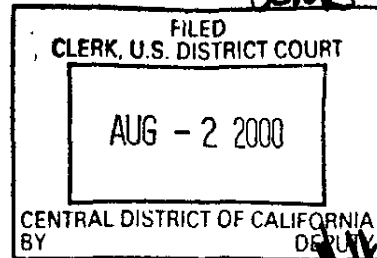


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ATTORNEYS FOR DEFENDANTS
BERNARD M. SMUKLER and LINDA SMUKLER



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JUAN MORENO,

Plaintiff,

vs.

BERNARD M. SMUKLER, an individual;
LINDA SMUKLER, an individual; DAVID
CHANG, an individual; and DOES 1
through 10, inclusive,

Defendants.

CASE No.: CV 00-05239 MMM (JWJx)

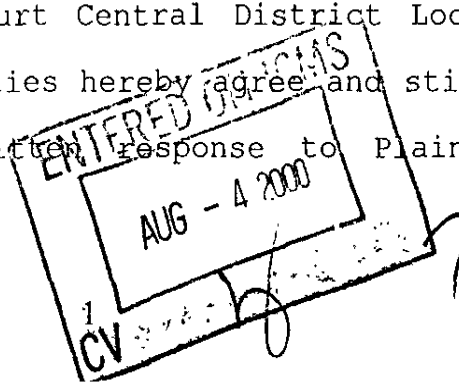
STIPULATION RE: EXTENSION OF TIME
FOR RESPONSE TO INITIAL COMPLAINT

CTRM: 790 (Hon. Margaret Morrow)
(Roybal Federal Bldg.)

TRIAL DATE: NONE
DISCOVERY CUTOFF: NONE
MOTION CUTOFF: NONE

Defendants, BERNARD M. SMUKLER and LINDA SMUKLER (hereinafter collectively "Defendants"), and Plaintiff, JUAN MORENO (hereinafter "Plaintiff"), through their attorneys of record, hereby agree and stipulate as follows:

Good cause exists to extend by thirty (30) days the time for Defendants' written response to Plaintiff's initial complaint, pursuant to United States District Court Central District Local Rules, Rule 3.11.1. Accordingly, the parties hereby agree and stipulate that the deadline for Defendants' written response to Plaintiff's initial



1 complaint is extended from August 5, 2000 to September 5, 2000. The
2 reason for the extension is that the parties have reached tentative
3 settlement in this matter and are in the process of preparing settlement
4 documents. Because of the pre-planned vacation of defense counsel,
5 however, it may not be possible to finalize and execute the settlement
6 and dismissal documents before the present August 5, 2000 deadline for
7 Defendants' written response.

8 The parties previously stipulated to extend the initial deadline
9 for filing of a responsive pleading from July 6, 2000 to August 5, 2000.

10 The parties further agree and stipulate that this Stipulation can
11 be signed in counter-parts and by facsimile.

12
13 DATED: July 25, 2000

LAUGHLIN, FAIBO, LEVY & MORESI, LLP
Attorneys at Law

14
15 By: 

PETER C. FLANDERKA, Esq.
Attorneys for defendants
BERNARD M. SMUKLER and LINDA
SMUKLER

16
17
18
19 DATED: July __, 2000

CENTER FOR DISABILITY ACCESS, LLP


20
21 By: _____

MARK D. POTTER, Esq.
Attorneys for plaintiff
JUAN MORENO

22
23 GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED.

24 *Last Continuance.*

25
26 DATED: August 1, 2000


UNITED STATES DISTRICT COURT JUDGE

27
28 A:\STIP2.WPD

complaint is extended from August 5, 2000 to September 5, 2000. The reason for the extension is that the parties have reached tentative settlement in this matter and are in the process of preparing settlement documents. Because of the pre-planned vacation of defense counsel, however, it may not be possible to finalize and execute the settlement and dismissal documents before the present August 5, 2000 deadline for Defendants' written response.

The parties previously stipulated to extend the initial deadline for filing of a responsive pleading from July 6, 2000 to August 5, 2000.

The parties further agree and stipulate that this Stipulation can be signed in counter-parts and by facsimile.

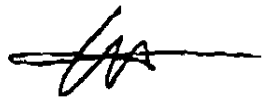
DATED: July __, 2000

LAUGHLIN, FALBO, LEVY & MORESI, LLP
Attorneys at Law

By: _____
PETER C. FLANDERKA, Esq.
Attorneys for defendants
BERNARD M. SMUKLER and LINDA
SMUKLER

DATED: July 25, 2000

CENTER FOR DISABILITY ACCESS, LLP

By:  _____
MARK D. POTTER, Esq.
Attorneys for plaintiff
JUAN MORENO

GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED.

DATED: _____

UNITED STATES DISTRICT COURT JUDGE

A:\STIP2.WPD

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
 COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 200 S. Los Robles Ave., Suite 500, Pasadena, California 91101.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Pasadena, California, addressed as follows:

DATE OF SERVICE : July 25, 2000

DOCUMENT SERVED : STIPULATION RE: EXTENSION OF TIME FOR RESPONSE TO INITIAL COMPLAINT

COUNSEL SERVED : Mark D. Potter, Esq,
 Center For Disability Access, LLP
 2535 Kettner Boulevard, Suite 2A5
 San Diego, California 92101-1253

XXX (BY REGULAR MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Pasadena, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

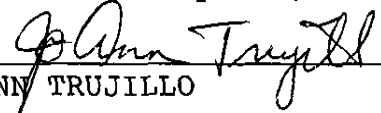
— (BY FEDERAL EXPRESS) I caused such envelope(s) to be delivered by air courier, with next day service.

— (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee(s).

— (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

XXX (FEDERAL) I declare that I am employed in the office of a member of the bar of this Court, at whose direction the service was made.

EXECUTED at Pasadena, California on July 25, 2000.


 JOANN TRUJILLO